

Law Office Of

Joaquin Perez

6780 Coral Way • Miami, Florida 33155
Phone (305) 261-4000 • Fax (305) 662-4067
jplaw1@bellsouth.net
(Also admitted in Massachusetts and Rhode Island)

Via ECF

May 25, 2020

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
New York, New York 10007

Re: United States v. Fredy Renan Najera Montoya
SI 15 Cr. 378 (PGG)

Dear Judge Gardephe,

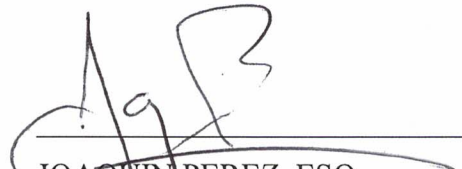
Defendant, Fredy Najera, respectfully prays for the entry of an Order amending SDNY CM/ ECF Dkt. No. 135 to reflect this Court's ruling granting the motion to withdraw the guilty plea previously entered on December 10, 2018. Transcript of Hearing on February 19, 2020 ("Trans. February, 19th").

Following the withdrawal of the previously entered guilty plea (*See* Dkt. No. 94), Defendant plead to Count One, a lesser included offense of Count Two, and to Count Three, also in exchange for the Defendant agreeing to a series of stipulations, including guidelines stipulations. (Trans. February 19th at 4. 13-18.).

This will clarify to the United States Probation Office that the operative change of plea took place on February 19, 2020, as opposed to December 10, 2018. By a different cover, Defendant will submit objections to the Pre-Sentence Investigation Report as well as a Sentencing Memorandum outlining relevant factors under 18 U.S.C. § 3553.

Accordingly, Defendant respectfully prays for the entry of an Order amending Dkt. No. 135, to incorporate the withdrawal of the December 10, 2018 change of plea and the entry of a new plea on February 19, 2020.

Respectfully submitted,



JOAQUIN PEREZ, ESQ.
6780 Coral Way
Miami, Florida 33155
Tel: (305) 261-4000
Fax: (305) 662-4067
NY. Bar No.: 5237532
Jplaw1@bellsouth.net

cc: Emil Bove, AUSA

Matt Laroche, AUSA

Jason Richman, AUSA